

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Advanced Flower Capital Inc. and AFC Agent LLC,

Plaintiffs,

-against-

Michael Kanovitz and Jon Loevy,

Defendants.

Case No. 1:25-cv-02996 (PKC)

**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

Pursuant to Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, O’Melveny & Myers LLP (“O’Melveny”), counsel of record for Plaintiffs Advanced Flower Capital Inc. and AFC Agent LLC (“AFC”), hereby moves the Court for an order permitting O’Melveny to withdraw as counsel of record for AFC. This motion includes all O’Melveny attorneys of record: Abby F. Rudzin, William J. Martin, and Alexander C. Miller.

O’Melveny has represented AFC in this matter since it was filed approximately two months ago. (*See* ECF No. 1.) AFC has now retained new counsel, Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”) who has appeared in this action and is familiar with the case. (*See* ECF Nos. 16 & 17.) O’Melveny is not asserting a retaining or charging lien.

The complaint was filed on April 10, 2025. Defendants have submitted pre-motion letters seeking to move to transfer and dismiss this case. (*See* ECF Nos. 11 & 15.) The parties are also currently negotiating a Proposed Civil Case Management Plan and Scheduling Order in advance of the scheduled June 9, 2025 case management conference. O’Melveny’s withdrawal will not prejudice any parties or delay resolution of this matter because AFC will be represented

by Quinn Emanuel, who is now handling AFC's responses to Defendants' two pending letter motions and negotiating the Proposed Civil Case Management Plan and Scheduling Order. Quinn Emanuel will represent AFC at the upcoming case management conference.

Accordingly, O'Melveny & Myers respectfully requests that this Court grant the motion and permit it to withdraw as counsel of record for AFC.

Dated: May 30, 2025

Respectfully submitted:

O'MELVENY & MYERS LLP

By: /s/ Abby F. Rudzin

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